

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BETHLEHEM AREA SCHOOL DISTRICT	:	
	:	
	:	NO. 02-4033
vs.	:	
	:	CIVIL ACTION - LAW
NAUTILUS INSURANCE COMPANY and	:	
SCOTTSDALE INSURANCE COMPANY	:	

**DISCLOSURE STATEMENT OF DEFENDANT,
NAUTILUS INSURANCE COMPANY, PURSUANT TO FED. R. CIV. P. 26(a)**

A. WITNESSES:

1. Kimberly Taube, Claims Adjuster, Nautilus Insurance Company, 7273 E. Butherus Drive, Scottsdale, AZ 85260, phone number 800-842-8972
2. Matthew J. Tokasey, Nautilus Insurance Company, 7273 E. Butherus Drive, Scottsdale, AZ 85260, phone number 800-842-8972
3. Underwriting Department Personnel, Nautilus Insurance Company, 7273 E. Butherus Drive, Scottsdale, AZ 85260, phone number 800-842-8972
4. Stanley J. Majewski, Bethlehem Area School District, c/o Paul A. Logan, Esquire, 475 Allendale Road, Suite 200, King of Prussia, PA 19406, phone number 610-354-9700
5. Mr. John C. White, White Brothers Construction, Inc., R.D. 2, Box 2646 Reading, PA 19605
6. Norman Snader, White Brothers Construction, Inc. R.D. 2, Box 2646, Reading, PA 19605
7. Robert A. Teodoro, Frontier Adjustors, P.O. Box 4110, Highland Park, NJ 08904, phone number 973-402-9816
8. James E. Detwiler, P.E., C.I.H. Environmental, Inc., 1044 Victory Circle, Reading, PA 19605, phone number 610-372-6692
9. Arif Fazil, D'Huy Engineering, Inc., 453 Main Street, Bethlehem, PA 18018, phone number 610-865-3000

10. Michael J. Franceski, D'Huy Engineering, Inc., 453 Main Street, Bethlehem, PA 18018, phone number 610-865-3000
11. Thomas J. Doluisio, Superintendent of Schools, Bethlehem Area School District, Education Center, 1516 Sycamore Street, Bethlehem, PA 18017-6099
12. Jeff Shippee, Shippee Mechanical Contractors, 3036 Lois Avenue, Bristol, PA 19007, 215-785-2310

B. DOCUMENTS:

1. See Responses of Defendant, Nautilus Insurance Company, to Plaintiff's Request for Production of Documents.

C. DAMAGES COMPUTATIONS:

1. None

D. INSURANCE:

1. A copy of the insurance policy of defendant, Nautilus Insurance Company, has already been supplied to plaintiff's counsel. A copy will be supplied to counsel for defendant, Scottsdale Insurance Company, along with this disclosure.

E. EXPERTS:

1. James E. Detwiler, P.E., C.I.H. Environmental, Inc., 1044 Victory Circle, Reading, PA 19605, phone number 610-372-6692. Curriculum Vitae to be supplied.
2. Insurance expert to be determined

JOHN CHURCHMAN SMITH & ASSOCIATES, P.C.

BY: _____

STUART S. SMITH, ESQUIRE
Attorney for Defendant,
Nautilus Insurance Company

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CERTIFICATE OF SERVICE

STUART S. SMITH, ESQUIRE, attorney for defendant, Nautilus Insurance Company, hereby certifies that a copy of Disclosure Statement of Defendant, Nautilus Insurance Company Pursuant to Fed. R. Civ. P. 26(a) was served upon all counsel of record by United States first class mail.

JOHN CHURCHMAN SMITH & ASSOCIATES, P.C.

Date: _____

BY: _____
STUART S. SMITH, ESQUIRE
Attorney for Defendant,
Nautilus Insurance Company